

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

2015 NOV 16 AM 12:16
FILED

Gwendolyn James Burt

(Name of Plaintiff(s))

v.

DHS/State of Tennessee

(Name of Defendant(s))

Civil Case No. _____

Jury Trial Requested: ☒ YES ☐ NO

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 as amended for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief is also sought under 42 U.S.C. § 2000e-5(g).

2. Plaintiff, Gwendolyn James Burt, is a citizen of the United States and resides at

1127 Walton Drive, Murfreesboro
Street address City

Rutherford, Tennessee, 37130, (615) 962-7862
County State Zip Code (area code) phone number

(If there is more than one plaintiff, provide the same information for each plaintiff below):

3. Defendant, DHS-State of Tennessee, lives at or its business is located at:

Old Fort Parkway, Murfreesboro, Murfreesboro
Street address City

Rutherford, TN, 37130, (615) 848-5153
County State Zip Code (area code) phone number

Revised 11/2014

(If there is more than one defendant, provide the same information for each defendant below):

4. Plaintiff sought employment from the defendant or was employed by the defendant at:

Deaderick St. CPB Nashville
 Street address City
Davidson Tennessee 37243
 County State Zip Code

5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 8–9 of this complaint on or about 16th December 2014.
 day month year

6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging the defendant with the acts of discrimination indicated in paragraphs 8–9 of this complaint on or about 19 April 2015.
 day month year

(Attach a copy of the charges filed with the Equal Employment Opportunity Commission attached to this complaint.)

7. The Plaintiff received a copy of the Notice of Right to Sue issued by the Equal Employment Opportunity Commission or the U.S. Department of Justice on 20 August 2015.
 day month year

(Attach a copy of the Notice to this complaint.)

8. Because of plaintiff's (1) ✓ race, (2) _____ color, (3) _____ sex, (4) _____ religion, or (5) _____ national origin, the defendant:

- (a) ✓ failed to employ plaintiff.
- (b) _____ terminated plaintiff's employment.
- (c) ✓ failed to promote plaintiff.
- (d) ✓ retaliated against plaintiff for having filed a charge of discrimination.

(e) ☒ other. Explain:

I AM in remission for breast cancer.

I suffer with High Blood Pressure, anxiety, and
migraines. I also suffer with Fibromyalgia.

9. The circumstances under which defendant discriminated against plaintiff were as follows:

RACE, color, discrimination-disability, retaliation, AGE.
Moved Donna Miller and Gwen Burt out AS WE ARE older and
we both have many years experience. Hired and brought in
younger employees, and filled open positions. I feel I am
being retaliated against after contacting HR for previous
complaints. I have 40 years with the State, and Donna Miller
has fourteen years with the state, and kept black employees
in our group while moving white race out.

(You may use additional paper if necessary.)

10. The acts set forth in paragraph 8 of this complaint

- (a) ☒ are still being committed by defendant.
 (b) ☐ are no longer being committed by defendant.
 (c) ☒ may still be being committed by defendant.

WHEREFORE, plaintiff prays that the Court grant the following relief to the plaintiff:

Positions to State Offices downtown Nashville, Tennessee
returned. Punitive and compensatory damages paid to
Donna Miller and Gwendolyn James Burt per our
settlement request letter. (SEE ATTACHED)

11. I request a jury trial: ☒ yes ☐ no

Gwendolyn James Burt

 Signature of plaintiff(s)